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Katherine Tollefson and Certain Mesothelioma Claimants

**IN THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF NEW JERSEY**

In re:

Chapter 11

LTL MANAGEMENT LLC,

Case No. 21-30589

Debtor.

Honorable Michael B. Kaplan

Hearing date: No Hearing

**MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC'S RENEWED OPPOSITION¹ TO
EXTENDING THE PRELIMINARY INJUNCTION TO NON-DEBTOR JOHNSON & JOHNSON**

The Seventh Amendment doesn't have a 'We Can Do It Better' exception. No matter how the Third Circuit rules, the "fundamental dispute" over Johnson & Johnson's talc is a jury question; one this Court will never have power to decide. Juries and trial court judges can't be swapped out with a Rule 706 expert, a bunch of mediators, and armies of bankruptcy professionals. A Bill of Rights boulder blocks any confirmed plan in this objectively unconstitutional corporate assault on individual rights. There's nothing to mediate, estimate, or resolve in this or any other Two Step. Not now. Not *ever*. MRHFM renews its Opposition (*see* Dkt. 2564) because justice so requires: the *only* ones harmed by these destined-for-failure "bankruptcies" are the sick people.

¹ In its Opinion of February 25th, the Court said it would re-visit the Injunction every 120 days. On July 28th, after briefing and argument, the Court said it would no longer do this. It's been over 240 days since February 25th.

Purportedly cleansed of asbestos liability, Kenvue (“New” JJCI) will “breathe life into some of the world’s most iconic and beloved brands” according to Thibaut Mongon, CEO designate and Project Plato hush-hush keeper. “We believe that daily self-care rituals add up over time and have a profound cumulative impact on your wellbeing.”² Thousands of Americans are dying because Johnson’s Baby Powder was part of their ‘self-care ritual.’ This daily asbestos exposure overwhelmed their defense mechanisms and the cumulative impact on *their* wellbeing is terminal cancer.

In Two Steps, bankruptcy courts give “breathing spells” and equitable relief to billionaire tortfeasors, manufactured stooge debtors, and countless “affiliates.” But they overrule the objections of mesothelioma plaintiffs that are slowly suffocating to death. Priority is given instead to the “re-organization” of useless sheets of paper. In the “broken” tort system, Johnson & Johnson paid \$966 million to thousands of cancer plaintiffs over five years. J&J hasn’t paid a dime since last October, but the Company just took \$16.6 billion in cash from its money clip and bought Abiomed.³ No wonder tort defendants love stuffing victims in Article I courts of “equity.”⁴

MRHFM’s clients, four of whom have died just since July 30th, won’t be bullied by Johnson & Johnson or outlasted by its Two Step long con. If the Third Circuit doesn’t dismiss this case, MRHFM’s plaintiffs will individually move to lift the stay, and, if denied, will liquidate their claims before juries in U.S. District Courts. In the meantime, everyone—lawyers, experts, financial advisors, mediators, a powerless FTCR—is getting paid in J&J’s “equitable and efficient” bankruptcy scam, except the sick people. All of whom object to being here, *if* it matters.

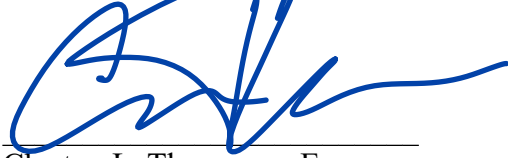
² <https://www.jnj.com/johnson-johnson-announces-kenvue-as-the-name-for-planned-new-consumer-health-company>

³ *J&J Agrees to Buy Medical-Device Maker Abiomed*, Peter Loftus, Wall Street Journal, November 1, 2022. Available at: <https://www.wsj.com/articles/j-j-agrees-to-buy-medical-device-maker-abiomed-11667301144>

⁴ *How corporate chiefs dodge lawsuits over sexual abuse and deadly products*, Mike Spector, et. al, Reuters, November 8, 2022. Available at <https://www.reuters.com/investigates/special-report/bankruptcy-tactics-releases/>

Sincerely:

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